



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AFM:MAA/IC/CB  
F. #2017R00906

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 6, 2025

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Michael McMahon  
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government writes to correct a statement in its sentencing submission dated April 3, 2025. (ECF No. 364.) In that submission, the government stated that Martha Byrne was a co-founder of the Pipe Hitter Foundation, an entity that has advocated on the defendant's behalf. (*Id.* at 26 n.16.) This statement appears to have been erroneous. The government regrets the apparent error.

Respectfully submitted,

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By: /s/  
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By: /s/  
Christine Bonomo  
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Cc: Clerk of the Court (by ECF and Email)  
Counsel of Record (by ECF)